

AO 91 (Rev 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America

v.

Jack Raymond Alexander Jr.

Case No. M- 24-51-AMG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 23, 2023, in the county of Oklahoma in the Western District of Oklahoma, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached Affidavit of Task Force Officer, Autumn Sheets, Bureau of Alcohol, Tobacco, Firearms and Explosives, which is incorporated and made a part of hereof by reference.

☒ Continued on the attached sheet.



Complainant's signature

Autumn Sheets, Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date:

1/19/24



Judge's signature

City and state:

Oklahoma City, Oklahoma

Amanda Maxfield Green, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Autumn Sheets, having been duly sworn, depose and state as follows:

1. I am a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), a division of the United States Department of Justice, having been so employed since August 2022. Along with my employment with the ATF, I am also a Police Officer with the Oklahoma City Police Department (OKCPD) and have been since May 2012. I am currently assigned as a detective with OKCPD. As a TFO with ATF, I am vested with the authority to investigate violations of federal laws including Title 18 of the United States Code.

2. I have been assigned to the ATF Oklahoma City Field Office since August 2022. I am familiar with the information contained in this Affidavit through personal investigation and/or information received from other law enforcement officers, mentioned herein, who have participated in and/or have contributed documentary reports of their investigative efforts in this matter. This Affidavit contains information necessary to support the Complaint and is not intended to include every fact or matter observed or known by me.

3. This Affidavit is presented for the limited purpose of seeking a federal complaint and arrest warrant for **Jack Raymond ALEXANDER Jr.**, a male with the date of birth XX/XX/1961 and social security number XXX-XX-XX32. This Complaint and arrest warrant are sought for **ALEXANDER's** violation of 18 U.S.C. § 922(g)(1).

FACTS SUPPORTING PROBABLE CAUSE

4. Based on an investigation I conducted, **ALEXANDER** was found to be a previously convicted felon in possession of a firearm.

5. **ALEXANDER's** criminal record includes the following felony convictions:

- a. two counts of Assault & Battery with a Dangerous Weapon in Tulsa County District Court case CF-1994-5102
- b. one count of Larceny from a Person at Night in Tulsa County District Court case CF-1999-1407
- c. one count of Unauthorized Use of a Motor Vehicle, one count of Eluding an Officer in Tulsa County District Court case CF-2006-1291
- d. one count of Unauthorized Use of a Motor Vehicle in Garfield County District Court case CF-2006-153
- e. one count of Unauthorized Use of a Motor Vehicle in Garfield County District Court case CF-2006-116
- f. one count of Possession of a Firearm After Former Felony Conviction, one count of Possession of a Controlled Dangerous Substance in Tulsa County District Court case CF-2009-1699

6. On December 24, 2023, **ALEXANDER** was arrested by OKCPD for domestic assault related charges.

7. On December 24, 2023, members of OKCPD responded to a 911 call in reference to a domestic assault, which occurred at a residence located in Oklahoma City ("the Residence"), in the Western District of Oklahoma. The caller, **ALEXANDER's** wife, was the victim of the assault.

8. OKCPD officers learned from the victim that on December 23, 2023, she and **ALEXANDER** were driving to Blanchard, Oklahoma to retrieve items from **ALEXANDER's** supervisor. The victim was driving the vehicle, and **ALEXANDER** was

in the front passenger seat. The victim said **ALEXANDER** randomly took out a loaded firearm and pointed it at the right side of her abdomen, before telling her if she said anything to his supervisor, he would kill her. After leaving **ALEXANDER**'s supervisor's home, they drove to KFC located at 2231 NW 23rd Street in Oklahoma City. Once at this location, **ALEXANDER** pointed the firearm at the right side of the victim's head and told her to stay inside of the vehicle. After they left the KFC, they drove to MidFirst Bank located at 2225 N. May Avenue in Oklahoma City. The victim drove the vehicle through the drive through as **ALEXANDER** once again pointed the firearm at the right side of the victim's abdomen as she spoke with the teller.

9. The victim and **ALEXANDER** went back to their home, the Residence, where he assaulted the victim with a hammer and strangled her. The victim also told officers **ALEXANDER** kicked her in the head multiple times. The victim explained that **ALEXANDER** believed that the victim was cheating on him with another man.

10. Later in the morning of December 24, 2023, the victim left the Residence and called the police to report the incident, resulting in the 911 call mentioned above.

11. Once OKCPD officers obtained the information and observed injuries to the victim consistent with her account of the incident, they made contact with **ALEXANDER** at the Residence and took him into custody, as noted above.

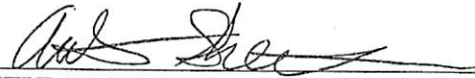
12. OKCPD officers learned **ALEXANDER** is a convicted felon. During a search of the Residence, which was conducted on December 24, 2023, with written consent of the victim, OKCPD officers were unable to locate the firearm used by **ALEXANDER**.

13. On December 29, 2023, the victim called 911 again and requested an OKCPD officer out to the Residence to collect evidence. The victim believed she had located homemade explosives made by **ALEXANDER** and access to an attic inside of the residence. After arrival and with the victim's consent, OKCPD Officer Bricker, #2438, looked inside of the attic, which was located inside of a closet. Officer Bricker located a black leather case in the attic. Inside of the black leather case was a black Bryco Arms, Model 59, semi-automatic 9mm handgun, serial number 604849, with two loaded magazines and two boxes of 100 rounds of 9mm ammunition. The victim told Officer Bricker she recognized the firearm as being the same firearm **ALEXANDER** had during their altercation.

14. During a phone call between **ALEXANDER** and the victim following **ALEXANDER's** arrest, the victim informed **ALEXANDER** that police had found the gun. **ALEXANDER** stated that he knew they would.

15. On January 12, 2024, ATF Special Agent Brian Anderson, a Firearms Interstate Nexus Examiner, examined the firearm seized in relation to **ALEXANDER's** arrest. It is his opinion based upon his observations that the firearm was not manufactured in Oklahoma and therefore crossed state lines to reach Oklahoma, thereby affecting interstate commerce.

16. Based upon the aforementioned facts and circumstances, I believe that probable cause exists that on or about December 23, 2023, within the Western District of Oklahoma, **ALEXANDER**, a previously convicted felon, did possess a firearm in violation of 18 U.S.C. § 922(g)(1).



AUTUMN SHEETS
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn and subscribed before me this 19th day of January, 2024.



AMANDA MAXFIELD GREEN
U.S. MAGISTRATE JUDGE